

# HAFETZ NECHELES & ROCCO

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February 17, 2012

VIA EMAIL AND ECF

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Unites States Attorney's Office  
Eastern District of New York  
271 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Pedro Espada Jr. et al.  
Cr. No. 10-985 (S-3) (FB)

Dear Counsel,

We received your letter and the chart asking us for the defendants to enter into some sort of stipulation concerning approximately 150 documents.

We cannot consider this request in its present form because you have not stated (1) who would be the witness who would testify about each document, and (2) what would the witness testify about each document that you are asking us to stipulate to. Please note that in general we are unlikely to agree to stipulate to facts but will agree in the appropriate situations to stipulate to what an identified witness would say if he or she were to testify at trial. Please provide us this information as to each document that you would like us to stipulate.

HAFETZ NECHELES & ROCCO

Very truly yours,

By: /s/Susan R. Necheles  
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